

COURT ORDERED QUESTIONNAIRE
TO BE USED BY THE JUDGE AT TRIAL

CASE TITLE: LeTray v. Watertown Jefferson County, et al.

CIVIL ACTION NO.: 20-cv-01194

DISTRICT JUDGE: Frederick J. Scullin, Jr.

Each attorney is required to submit the following information on behalf of his/her client for use by the Court during Voir Dire and to file this document with the Court on or before June 10, 2024.

NAMES AND ADDRESSES OF ALL PARTIES TO THE LAWSUIT:

See attachment.

(use additional page if necessary)

COUNSEL'S NAME, FIRM NAME, ADDRESS AND THE NAME OF ANY PARTNER OR ASSOCIATE WHO MAY BE AT COUNSEL TABLE DURING THE COURSE OF THE TRIAL.

See attachment.

(use additional page if necessary)

SET FORTH THE DATE OF THE OCCURRENCE, THE PLACE OF THE OCCURRENCE AND A BRIEF STATEMENT OF THE EVENTS CENTRAL TO THE LITIGATION.

See attachment.

(use additional page if necessary)

SET FORTH THE NAMES AND ADDRESSES OF ALL LAY WITNESSES TO BE CALLED.

See attachment.

(use additional page if necessary)

SET FORTH THE NAMES AND ADDRESSES OF ALL EXPERT WITNESSES TO BE CALLED GIVING A BRIEF DESCRIPTION OF THEIR AREAS OF EXPERTISE.

See attachment.

(use additional page if necessary)

SET FORTH A BRIEF DESCRIPTION OF EACH AND EVERY CAUSE OF ACTION IN THE COMPLAINT.

See attachment.

(use additional page if necessary)

SET FORTH A BRIEF DESCRIPTION OF EACH AND EVERY AFFIRMATIVE DEFENSE ASSERTED AS WELL AS A STATEMENT ADDRESSING ANY COUNTERCLAIMS AND/OR CROSS-CLAIMS RAISED IN THE ANSWER.

See attachment.

(use additional page if necessary)

PLEASE TAKE NOTICE that the Court will explain any delay in jury selection occasioned by the failure to provide this information to the jury as to the extent of the delay and the attorney causing same; and, if the delay causes a one (1) day or more postponement of this trial, the Court will impose appropriate monetary sanctions.

Date: June 10, 2024

/s/ Jessica Perry

(Signature of Attorney)

Bar Roll #: 702461

Attorney for Plaintiff

/s/ Jonathan Fellows

(Signature of Attorney)

Bar Roll #: 101628

*Attorney for Watertown
Defendants*

/s/ Kayla Arias

(Signature of Attorney)

Bar Roll #: 519953

*Attorney for Jefferson County
Defendants*

ATTACHMENT TO COURT ORDERED QUESTIONNAIRE

NAMES AND ADDRESSES OF ALL PARTIES TO THE LAWSUIT.

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SET FORTH THE DATE OF THE OCCURRENCE, THE PLACE OF THE OCCURRENCE AND A BRIEF STATEMENT OF THE EVENTS CENTRAL TO THE LITIGATION.

The plaintiff alleges that on the night of September 28, 2017, Watertown police officers discriminated against her on the basis of her transgender status during an arrest that took place at 1418 State Street in the City of Watertown, New York. The plaintiff further alleges that once she was transported to the Public Safety Building in Watertown for booking, police officers continued to discriminate against her on the basis of her transgender status and used excessive force against her. The plaintiff also alleges that when she was taken to the Jefferson County Correctional Facility, Jefferson County Sheriff Deputies working as corrections officers discriminated against her on the basis of her transgender status and sexually assaulted her during a strip search. The plaintiff further alleges that the actions of Watertown police officers and Jefferson County corrections officers caused her physical and psychological injuries and that the policies of Watertown and Jefferson County caused her injuries.

The Watertown police officer defendants deny that they used excessive force or discriminated against the plaintiff on the basis of her transgender status. The Jefferson County corrections officer defendants deny that they discriminated against the plaintiff on the basis of her transgender status or that they sexually assaulted the plaintiff.

SET FORTH THE NAMES AND ADDRESSES OF ALL LAY WITNESSES TO BE CALLED.

For Plaintiff

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For Watertown Defendants

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Officer Virginia Sherrill
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SET FORTH THE NAMES AND ADDRESSES OF ALL EXPERT WITNESSES TO BE CALLED GIVING A BRIEF DESCRIPTION OF THEIR AREAS OF EXPERTISE.

Dr. Randi Ettner, PhD

Dr. Ettner is a licensed clinical and forensic psychologist with a specialization in the diagnosis, treatment, and management of gender dysphoric individuals.

Dr. Gagandeep Jattana, MD

Dr. Gagandeep Jattana is a medical doctor and a psychiatrist.

SET FORTH A BRIEF DESCRIPTION OF EACH AND EVERY CAUSE OF ACTION IN THE COMPLAINT.

The following claims remain for trial: (1) Fourteenth Amendment denial of equal protection against Defendants City of Watertown, Jefferson County, O'Neill, Spencer, Donoghue, Dettmer, Cummings, Larkins, Davis and White; (2) denial of equal protection in violation of the New York State Constitution against Defendants City of Watertown, Jefferson County, O'Neill, Spencer, Donoghue, Dettmer, Cummings, Larkins, Davis, and White; (3) discrimination in violation of New York Civil Rights Law § 40-c against Defendants City of Watertown, Jefferson County, O'Neill, Spencer, Donoghue, Dettmer, Cummings, Larkins, Davis, and White; (4) Fourth Amendment unreasonable body-cavity search against Defendant Dettmer; (5) Fourth and Fourteenth Amendment sexual assault against Defendant Dettmer; (6) Fourteenth Amendment failure to intervene against Defendants Cummings, Larkins, and Davis; and (7) Fourth Amendment excessive use of force against Defendants Cummings, White, and Dettmer.

SET FORTH A BRIEF DESCRIPTION OF EACH AND EVERY AFFIRMATIVE DEFENSE ASSERTED AS WELL AS A STATEMENT ADDRESSING ANY COUNTERCLAIMS AND/OR CROSS-CLAIMS RAISED IN THE ANSWER.

The Watertown Defendants have asserted defenses of absolute and qualified immunity.

The Jefferson County Defendants have asserted the defenses of qualified immunity; failure to mitigate; and damages and injuries, if any, sustained by Plaintiff, were proximately caused by superseding and/or intervening causes and not by any action or omission of the County Defendants.